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14 *Attorneys for Defendant Dr. Osama Abuirshaid*

15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
17

18 Matthew Weinberg, *et al.*,
19 Plaintiffs,
20 v.
21 National Students for Justice in
22 Palestine, *et al.*,
23 Defendants.

Case No. 2:25-cv-03714

**DEFENDANT DR. OSAMA
ABUIRSHAIID'S REPLY IN SUPPORT
OF HIS MOTION TO DISMISS
PLAINTIFFS' AMENDED
COMPLAINT**

Hearing: December 15, 2025

Time: 9:00 a.m.

Location: Courtroom 7C

First Street U.S. Courthouse
350 W. 1st St.
Los Angeles, CA 90012

Honorable Mark C. Scarsi
United States District Judge

[Additional Counsel Cont. from previous page]

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Attorney for Defendant Dr. Osama Abuirshaid

1 **I. INTRODUCTION**

2 Dr. Osama Abuirshaid (“Dr. Abuirshaid”) respectfully reiterates his request that
3 this Court dismiss Plaintiffs’ claims against him, as Plaintiffs’ Response fails to rebut Dr.
4 Abuirshaid’s arguments for dismissal. Plaintiffs fail to counter the substantive arguments
5 made by Defendant Dr. Abuirshaid in two ways: Plaintiffs fail to establish personal
6 jurisdiction over Dr. Abuirshaid, and further fail to demonstrate any connection between
7 Dr. Abuirshaid and NSJP. For those reasons and the remainder of the authority set forth
8 in his Motion to Dismiss, Dr. Abuirshaid respectfully requests this Court grant his Motion
9 to Dismiss in full.

10 **II. ARGUMENT**

11 **A. Plaintiffs Fail to Meet Their Burden to Establish Personal Jurisdiction**

12 Plaintiffs’ single sentence addressing personal jurisdiction as to Dr. Abuirshaid,
13 unsupported by any case law, fails to meet their burden to establish that this Court may
14 properly exercise personal jurisdiction over Dr. Abuirshaid. *See* Plaintiffs’ Omnibus
15 Opposition to Defendants’ Motions to Dismiss at 46, ECF No. 81 (“Plaintiffs’
16 Response”). Plaintiffs fail to show Dr. Abuirshaid had any regular contact with
17 California, much less the minimum contacts required by well-established
18 precedent. *Compare* Plaintiffs’ Response at 46 (“[T]he FAC alleges facts supporting a
19 plausible inference that the effects of neglecting or refusing to aid in preventing the
20 conspiracy would foreseeably be felt in California”) *with* *Burger King Corp. v.*
21 *Rudzewicz*, 471 U.S. 462, 474 (1985) (holding the mere foreseeability of causing injury

1 in another state does not suffice). Dr. Abuirshaid cannot properly be haled before this
2 Court, and he therefore respectfully requests this Court dismiss all claims against him.

3 **B. Plaintiffs Fail to Plead a Sufficient Connection Between Dr. Abuirshaid and**
4 **NSJP**

5 Plaintiffs assert Dr. Osama Abuirshaid “knew that AMP was ‘coordinating ...
6 support’ for NSJP.” Plaintiffs’ Response at 47. Plaintiffs further assert Dr. Abuirshaid
7 could have “conditioned any continued support for [NSJP].” Plaintiffs’ Response at 46.
8 Yet Dr. Abuirshaid was in no literal position to influence NSJP activities, given neither
9 he nor AMP have any corporate or other structural relationship with NSJP. Nor do
10 Plaintiffs plausibly plead that Dr. Abuirshaid ever held any leadership or controlling role
11 within NSJP. Plaintiffs’ reliance on NSJP’s actions in an attempt to create liability for Dr.
12 Abuirshaid fails as a matter of law.

13 **III. CONCLUSION**

14 Dr. Abuirshaid is a highly respected expert on Palestine and Middle Eastern
15 Affairs. As the Executive Director of American Muslims for Palestine, he regularly
16 lectures, travels, and presents speeches on these topics related to Middle Eastern Affairs.
17 He had no involvement in the events that occurred on UCLA’s campus. Plaintiffs disagree
18 with Dr. Abuirshaid’s work. That disagreement does not, however, grant them the right
19 to conflate Dr. Abuirshaid’s constitutionally protected speech and association with
20 unfounded allegations of illegal behavior. Plaintiffs’ claims against Dr. Abuirshaid fail
21 under the law, and he therefore respectfully requests this Court dismiss Plaintiffs’ claims

1 against him in full, and award him reasonable attorneys' fees as this Court sees fit.

2
3 Respectfully submitted this 5th day of December, 2025.

4 /s/ Max Schoening

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17 *Attorneys for Defendant Dr. Osama Abuirshaid*

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was electronically filed and served upon all counsel of record. Parties may access this filing through the Court's CM/ECF System.

Dated this 5th day of December, 2025.

/s/ Max Schoening
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